



Silver State Health Insurance Exchange

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July 25, 2018

Nevada Division of Insurance Commissioner Barbara Richardson 1818 E. College Parkway, Suite 103 Carson City, NV 89706



RE: Proposed adoption, amendment or repeal of regulations pertaining to chapter NAC 686A – LCB File No. R001-18 – Producer Fees

Dear Commissioner Richardson,

Thank you for allowing Nevada's Silver State Health Insurance Exchange (Exchange) to submit comments and recommendations to the Division of Insurance (DOI) related to LCB File No. R001-18

Producer Fees. The Exchange commends the DOI for working responsively and collaboratively with the producer community to address fees for service. While the proposed amendments contain prescriptive and defined language, the Exchange believes the language should provide further clarification related to disclaimers and fee uniformity.

Section 1 and 3 of the proposed language offers a strong foundation for consumer related transparency through the disclosure of certain information. The Exchange recommends strengthening these sections by adding definitive language describing the timing and methods of disclosure, including a requirement that the agreement for consultation be made available in the consumer's primary language. Furthermore, the Exchange recommends including information in the agreement for consultation that explicitly notifies the consumer that they have the option to alternatively receive free consultation through the Nevada Health Link.

The Exchange recognizes the intent of the NAC amendment to allow licensed producers to charge a fee for providing consultation or related advice for health insurance. The Exchange recommends adding language requiring that producers charge a reasonable and uniform fee for these services. Defining fees as reasonable and uniform ensures transparency and improves consumer protections.

Please feel free to contact me should you have any questions or require any additional information.

Respectfully,

Heather Korbulic Executive Director

Silver State Health Insurance Exchange

HEATHER KORENIC

Sue Bell

From: Heather Korbulic

Sent: Wednesday, July 25, 2018 9:51 AM

To: Sue Bell

Cc: Jack Childress; Nick Stosic
Subject: Exchange Response to LCB

Attachments: Response to DOI Broker Fee Rule 07242018 FINAL.pdf

Hi Sue,

Please see the attached letter in response to the Division's proposed changes to NAC 686A. Thank you for your time and attention.

Please let me know if you have any additional questions.

Heather Korbulic
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